

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL MOTION TO COMPEL  
DISCOVERY AND SUPPORTING DECLARATION**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Defendant's unredacted Motion to Compel Discovery and Exhibits A-B to the Declaration of Matthew J. Antonelli in Support of Defendants' Motion to Compel Discovery (collectively, ECF No. 117). In support of this request to seal, Defendants state as follows:

1. Portions of the Motion to Compel contain information designated by Plaintiff as Highly Confidential Information pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

2. Exhibit A to the Declaration of Matthew J. Antonelli consists of a document produced by Plaintiff during the course of discovery. Plaintiff designated this document as Highly Confidential pursuant to the Stipulated Protective Order.

3. Exhibit B to the Declaration of Matthew J. Antonelli consists of email correspondence between counsel for Castle Hill and counsel for VGT dated between July 8, 2018 and July 31, 2018. The correspondence contains sensitive and proprietary trade secret

information. Pursuant to paragraph 2(c) of the Protective Order, such information is to be treated as Highly Confidential Information.

4. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, unredacted Opposition with a public, redacted Exhibit A and Exhibit B to the Declaration of Matthew J. Antonelli (ECF No. 118), and a sealed, unredacted Opposition, and a sealed, unredacted Exhibit A and Exhibit B to the Declaration of Matthew J. Antonelli (ECF No. 117).

WHEREFORE, Defendants respectfully request that the Court enter an Order sealing the Motion to Compel and Exhibits A-B to the Declaration of Matthew J. Antonelli.

Dated: August 3, 2018

Respectfully submitted,

/s/ Robert C. Gill

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of August, 2018, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL MOTION TO COMPEL DISCOVERY AND SUPPORTING DECLARATION** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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